

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Avon Products Inc. Securities Litigation

No. 19-cv-01420-MKV
CLASS ACTION

**NOTICE OF LEAD PLAINTIFF'S MOTION FOR FINAL APPROVAL
OF CLASS ACTION SETTLEMENT AND PLAN OF ALLOCATION**

PLEASE TAKE NOTICE, that Court-appointed Lead Plaintiff Holly Ngo respectfully moves the Court before the Hon. Mary Kay Vyskocil, United States District Judge, Southern District of New York, at the Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York 10007, on behalf of herself and all other members of the proposed Settlement Class, pursuant to Rule 23 of the Federal Rules of Civil Procedure, for entry of a Final Judgment and Order of Dismissal with Prejudice approving the proposed Settlement as fair, reasonable, and adequate, and approving the proposed Plan of Allocation for the proceeds of the Settlement as fair, reasonable, and adequate.

PLEASE TAKE FURTHER NOTICE, that in support of her motion, Lead Plaintiff will rely upon:

(A) the accompanying Declaration of Gregory M. Nespole in Support of (i) Lead Plaintiff's Motion for Final Approval of Class Action Settlement and Plan of Allocation, and (ii) Lead Counsel's Motion for an Award of Attorneys' Fees and Expenses and Awards Pursuant to 15 U.S.C. §78u-4(a)(4) and the exhibits thereto;

(B) the accompanying Declaration of Holly Ngo in Support of (i) Lead Plaintiff's Motion for Final Approval of Class Action Settlement and Plan of Allocation, and (ii) Lead Counsel's Motion for an Award of Attorneys' Fees and Expenses and Awards Pursuant to 15 U.S.C. §78u-4(a)(4);

(C) the accompanying Declaration of David Klungle in Support of (i) Lead Plaintiff's Motion for Final Approval of Class Action Settlement and Plan of Allocation, and (ii) Lead Counsel's Motion for an Award of Attorneys' Fees and Expenses and Awards Pursuant to 15 U.S.C. §78u-4(a)(4); and

(D) the accompanying Declaration of Jessie Mahn Regarding (I) Mailing of Notice and Proof of Claim Form; (II) Publication of Summary Notice; (III) Call Center Services; (IV) the Settlement Website; and (V) Requests for Exclusion and Objections Received to Date and the exhibits thereto.

PLEASE TAKE FURTHER NOTICE, that pursuant to the Court's Order Granting Preliminary Approval of Settlement dated August 31, 2020 (ECF 74), the Final Approval Hearing is scheduled to be held before the Court on January 20, 2021 at 2:00 PM, in Courtroom 18C of the Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York 10007.

A proposed Final Judgment and Order of Dismissal with Prejudice was submitted with Lead Plaintiff's motion for preliminary approval of the Settlement, filed August 21, 2020 (ECF 71-1).

Dated: New York, New York
December 16, 2020

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